

The Honorable Robert S. Lasnik

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA**

SUSAN SOTO PALMER, et al.,

Plaintiffs,

v.

STEVEN HOBBS, et al.,

Defendants.

JOSE TREVINO, et al.

Intervenor-Defendants.

NO. 3:22-cv-05035-RSL

DECLARATION OF NICHOLAS
PHARRIS IN SUPPORT OF DEFENDANT
SECRETARY OF STATE STEVEN
HOBBS'S RESPONSE TO PLAINTIFFS'
BRIEF IN SUPPORT OF REMEDIAL
PROPOSALS

I, Nicholas Pharris, declare as follows:

1. I am over the age of 18, competent to testify as to the matters herein, and make this declaration based on my personal knowledge. I am currently employed as the Support Lead for the VoteWA/TotalAddress election management system in the Elections Division of the Office of the Secretary of State, a position I have held since 2019.

2. In 2011 and 2012, I worked for the Washington State Redistricting Commission as a GIS and data analyst.

3. I served as Washington's designated Redistricting Data Liaison for the 2020 Census.

1 5. Following the adoption of the 2021 Redistricting Commission's final plan, I
2 worked with county election administrators to review the proposed redistricting changes and
3 identify technical fixes to district lines necessary for effective election administration.

4 6. I have reviewed and analyzed the block assignment and geojson files of Plaintiffs'
5 remedial proposals, which Plaintiffs made available on December 1, 2023.

6 7. As part of my review of Plaintiffs' remedial maps, I identified the counties
7 affected by each proposal. Plaintiffs' Remedial Proposal 1 affects the following counties:
8 Adams, Benton, Chelan, Clark, Douglas, Franklin, Grant, King, Klickitat, Lewis, Pierce,
9 Thurston, and Yakima. Plaintiffs' Remedial Proposal 2 affects the following counties: Adams,
10 Benton, Clark, Franklin, Grant, King, Klickitat, Lewis, Pierce, Thurston, and Yakima. Plaintiffs'
11 Remedial Proposal 3 affects the following counties: Adams, Benton, Chelan, Clark, Douglas,
12 Franklin, Grant, King, Klickitat, Pierce, Thurston, and Yakima. Plaintiffs' Remedial Proposal 4
13 affects the following counties: Adams, Benton, Clark, Franklin, Grant, King, Klickitat, Pierce,
14 Thurston, and Yakima. Plaintiffs' Remedial Proposal 5 affects the following counties: Benton,
15 Klickitat, and Yakima.

16 8. As part of my review of Plaintiffs' proposed remedial maps, I also identified
17 positions for which incumbents would be displaced (i.e., under which the incumbent would no
18 longer live in the district that the incumbent currently represents). I made this determination
19 using the same method that the Office of the Secretary of State uses to determine a candidate's
20 eligibility to hold office, which relies on the candidate or officeholder's residential address in
21 the voter registration database.

22 9. Plaintiffs' Remedial Proposal 1 would have the following impacts on incumbent
23 officeholders: The current LD 8 Representative, Position 1 would reside in LD 16; the current
24 LD 12 Senator would reside in LD 7; the current LD 14 Senator and Representative, Position 1
25 would reside in LD 15; the current LD 14 Representative, Position 2 would reside in LD 17; the
26

1 current LD 15 Senator would reside in LD 16; and the current LD 31 Senator and Representative,
2 Position 1 would reside in LD 5.

3 10. Plaintiffs' Remedial Proposal 2 would have the following impacts on incumbent
4 officeholders: The current LD 8 Representative, Position 1 would reside in LD 16; the current
5 LD 14 Senator and Representative, Position 1 would reside in LD 15; the current LD 14
6 Representative, Position 2 would reside in LD 17; and the current LD 15 Senator would reside
7 in LD 16.

8 11. Plaintiffs' Remedial Proposal 3 would have the following impacts on incumbent
9 officeholders: The current LD 8 Representative, Position 1 would reside in LD 16; the current
10 LD 12 Senator would reside in LD 7; the current LD 14 Senator and Representative, Position 1
11 would reside in LD 15; the current LD 14 Representative, Position 2 would reside in LD 17; the
12 current LD 15 Senator would reside in LD 16; and the current LD 31 Senator would reside in
13 LD 5.

14 12. Plaintiffs' Remedial Proposal 4 would have the following impacts on incumbent
15 officeholders: The current LD 8 Representative, Position 1 would reside in LD 16; the current
16 LD 14 Senator and Representative, Position 1 would reside in LD 15; the current LD 14
17 Representative, Position 2 would reside in LD 17; and the current LD 15 Senator would reside
18 in LD 16.

19 13. Plaintiffs' Remedial Proposal 5 would have the following impacts on incumbent
20 officeholders: The current LD 14 Representative, Position 1 would reside in LD 13; the current
21 LD 14 Representative, Position 2 would reside in LD 16; and the current LD 15 Representatives,
22 Positions 1 and 2, would reside in LD 14.

1 I declare under penalty of perjury under the laws of the State of Washington and the
2 United States that the foregoing is true and correct.

3 SIGNED this 21st day of December 2023, at Olympia, Washington.

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6 NICHOLAS PHARRIS
VoteWA Support Lead

DECLARATION OF SERVICE

I hereby declare that on this day I caused the foregoing document to be electronically filed with the Clerk of the Court using the Court's CM/ECF System which will serve a copy of this document upon all counsel of record.

DATED this 22nd day of December 2023, at Olympia, Washington.

s/ Leena Vanderwood
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